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September 19, 2024

**By ECF**

Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn NY 11201

Re: *United States v. Zhu*, 21 Cr. 265 (PKC)

Your Honor:

I represent Zhu Yong (aka Yong Zhu) in the above-captioned case. I write without objection from Pretrial Services or the government respectfully to request that Mr. Zhu be permitted to travel to Connecticut and spend the night at the discretion of Pretrial Services. Mr. Zhu's bail conditions permit him to travel to Connecticut with Pretrial's approval; but he presently needs the Court's approval to remain overnight. Mr. Zhu and his family own a home in Connecticut, which has fallen into disrepair recently, and he would like to spend the night occasionally. Mr. Zhu has been released on bond for nearly four years – since October 28, 2020 – without issue.

I therefore respectfully request that Mr. Zhu's bail conditions be modified to permit him to spend the night in Connecticut with Pretrial's permission but without requiring approval from the Court. Pretrial Services Officer Chijoke Ezenyilimba informs me that he does not object, and Assistant United States Attorney Meredith Arfa states that the government defers to Pretrial Services. Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman

Benjamin Silverman

*Attorney for Zhu Yong (aka Yong Zhu)*

cc: Counsel of record (by ECF)

Pretrial Services Officer Ezenyilimba (by email)